



NORTH CENTRAL SIGHT SERVICES, INC.

Member of Pennsylvania Association for the Blind

ROBERT B. GARRETT ■ President/C.E.O.

February 8, 2005

Subject: Proposed Rule Making

Dear Committee:

I am writing on behalf of our organization and commenting on the proposed rule making on board governance and executive compensation.

The Committee has been established to oversee the JWOD program and as charged is responsible to see that this program provides employment for people who are blind or severely disabled. This is accomplished by the addition of products and services to the Federal Procurement List.

This proposed rule making far exceeds the responsibilities of the Committee as set forth in the law. If enacted, it would provide an additional layer of bureaucracy, reporting and additional audits, all costly and already required by other governing entities. Additionally, the Committee has no authority to delve in to executive compensation. The complexity of agencies varies significantly from one NPA to another. To set an arbitrary salary cap is unnecessary and usurps the governance and fiduciary responsibility of the local Board of Directors. If this rule making is permitted to go through as proposed, it will make the job of finding willing Directors to serve on our local boards even more challenging. The last thing local agencies need or want is to have another government agency telling them how to run their agency particularly when their governance is strong.

Local funding sources will look at the level of additional reporting and the related administrative costs as excessive thus jeopardizing programming funding.

We wish to go on record opposing this rule making. The Committee should spend its limited resources finding ways to promote and expand employment for people who are blind and severely disabled rather than wasting its resources duplicating governance oversight already in place.

Sincerely,

A handwritten signature in black ink, appearing to be "R. B. Garrett", written over a horizontal line.



Robert B. Garrett,
President/C.E.O.

CC: Mr. John G. Heyer, Counsel
Ms. Katherine Astrich

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